

Hearing Date and Time: June 26, 2007 at 10:00 a.m.
Response Date and Time: June 19, 2007 at 4:00 p.m.

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Attorneys for JCI Technology Company

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
In re	:	
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Chapter 11
	:	
Debtors.	:	Case No. 05-44481 (RDD)
	:	
	:	(Jointly Administered)
	:	
-----X		

RESPONSE OF JCI TECHNOLOGY COMPANY (CLAIM NUMBER 15519)
TO DEBTOR'S FOURTEENTH OMNIBUS OBJECTION (PROCEDURAL)
PURSUANT TO 11 U.S.C. §502(b) AND FED. R. BANKR. P. 3007 TO
CERTAIN(A) DUPLICATE OR AMENDED CLAIMS AND (B) PROTECTIVE CLAIMS

JCI Technology Company, ("JCI Technology") responds to the objection of Delphi Corporation and its debtor affiliates (collectively, the "Debtors") concerning claim number 15519 that JCI Technology Company filed against Delphi Automotive Systems LLC follows:

1. Claim number 15519 is based upon potential breaches of contract arising under a certain Sale, Purchase and Transfer Agreement of Certain Battery Assets in effect between JCI Technology and Delphi Automotive Systems LLC.

2. The Debtors have objected to claim number 15519 as a so-called "Protective Claim" which they contend is premature unless and until the Debtors reject the underlying agreement under Section 365 of the Bankruptcy Code. The Debtors contend that since they have not yet so rejected the underlying agreement, JCI Technology's claim number 15519 should be disallowed and expunged.

3. Although JCI Technology acknowledges that rejection of the underlying agreement would give rise to one or more claims against the Debtors, there are other ways that the Debtors could breach and may have breached such agreement. Those breaches would presumably give rise to damages claims by JCI Technology.

4. JCI Technology reserves the right to amend claim number 15519 to provide the details of any such contractual breaches by the Debtors and the amount of such damages.

5. In the circumstances, the objection to claim number 15519 should be overruled. The person authorized to reconcile and resolve this objection is Stephen T. Bobo, Reed Smith Sachnoff & Weaver, 10 South Wacker Drive, 40th Floor, Chicago, Illinois 60606, 312-207-6480.

Dated: June 19, 2007

RESPECTFULLY SUBMITTED

JCI Technology Company

By: /s/ Elena Lazarou

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